

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**EUGENE DIVISION**

**UNITED STATES OF AMERICA**

**6:21-cr-00176-MC**

**v.**

**SUPERSEDING INDICTMENT**

**GARY EDWARD FRANKLIN,**

**18 U.S.C. § 876(c)**

**18 U.S.C. § 2261A(2)(A) and (B)**

**Defendant.**

**UNDER SEAL**

**THE GRAND JURY CHARGES:**

**COUNT 1**

**(Mailing a Threatening Communication)**  
**(18 U.S.C. § 876(c))**

On or about December 28, 2020, in the District of Oregon, defendant **GARY EDWARD FRANKLIN**, knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service a communication addressed to AV1, containing a threat to injure AV1,

In violation of Title 18, United States Code, Section 876(c).

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**Superseding Indictment**

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**COUNT 2**  
**(Mailing a Threatening Communication)**  
**(18 U.S.C. § 876(c))**

On or about May 3, 2021, in the District of Oregon, defendant **GARY EDWARD FRANKLIN**, knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service a communication addressed to AV1, containing a threat to injure AV1,

In violation of Title 18, United States Code, Section 876(c).

**COUNT 3**  
**(Stalking)**  
**(18 U.S.C. § 2261A(2)(A) and (B))**

From on or about December 28, 2020, through on or about May 3, 2021, in the District of Oregon, defendant **GARY EDWARD FRANKLIN**, with the intent to harass and intimidate, used the mail to engage in a course of conduct that placed AV1 in reasonable fear of death and serious bodily injury, and caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to AV1.

In violation of Title 18, United States Code, Section 2261A(2)(A) and (B).

Dated: December 16, 2021

A TRUE BILL.

Presented by:

SCOTT ERIK ASPHAUG  
Acting United States Attorney

  
ADAM E. DELPH  
Assistant United States Attorney

**Superseding Indictment**

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